



January 20, 2020

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
Title V Program
P.O. Box 4312
Baton Rouge, Louisiana 70821-4312
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**SUBJECT: Annual Monitoring Report under 40 CFR 60, Subpart OOOOa
Gulf South Pipeline Company, LP
Montz Compressor Station
Agency Interest Number 201951
Permit Number 2520-00177-00**

To Whom It May Concern:

Gulf South Pipeline Company, LP (Gulf South) is submitting this annual report for its Montz Compressor Station, located in St. Charles Parish, as required by 40 CFR 60.5420a(b). The address for the facility is 945 Evangeline Road, Montz, LA 70068. The front gate for the facility is located at 30.0350° North, 90.4470° West.

This compressor station was initially placed into service on November 1, 2018, which constitutes the beginning of the initial compliance period under Subpart OOOOa pursuant to 40 CFR 60.5410a. This report covers the initial compliance period, which is from November 1, 2018 through October 31, 2019. Pursuant to 60.5420a(b), the report is due within 90 days after the end of the initial compliance period, making the due date January 29, 2020. This submittal is therefore timely.

Construction of this station commenced after September 18, 2015; therefore, the collection of fugitive emission components at the station are considered an affected facility pursuant to 40 CFR 60.5365a(j). As such, the site is subject to the leak detection and repair (LDAR) provisions found in 40 CFR 60.5397a. One of the affected facilities covered by this report is the collection of fugitive emission components at the compressor station

Pursuant to 40 CFR 60.5397a(f)(2), the initial LDAR survey for this facility was due by December 30, 2018. As shown in the attached records, the initial LDAR survey was conducted on December 13, 2018 and subsequent quarterly surveys have been completed as required. Each quarterly survey was separated by at least 60 days pursuant to 60.5397a(g)(2).

The reporting requirements of 40 CFR 60.5420a(b)(7) are all met with this submittal (including attachments). Tables 1 and 2 provide many of the details in conjunction with the information provided in this letter. There are no components at this facility classified as difficult-to-monitor or unsafe-to-monitor; therefore, no monitoring of such components occurred during the reporting period. This statement satisfies 60.5420a(b)(7)(ix).

As reflected in attached Table 2, one of the leaks detected during the reporting period was not repaired within the timeframes outlined in 40 CFR 60.5397a(h). Specifically, a valve packing leak detected on December 13, 2018 was not repaired until January 21, 2019. This repair did not qualify for the delay of

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repair provisions outlined in 60.5397a(h)(2); therefore, the repair timeframe deviates from the requirements of 60.5397a(h). This was a result of site personnel not fully understanding the repair requirements following the initial survey. Site personnel have been retrained on the repair provisions to help eliminate this from occurring in the future.

Leak #1 detected on December 13, 2018 required depressurization of the emergency generator fuel gas piping in order to attempt repairs. The emergency generator was still under warranty; therefore, Caterpillar service personnel were brought onsite to complete the repairs. The fuel gas piping was depressurized and repairs were attempted. Following repressurization of the piping, it was discovered the repair was not successful using soap bubbles. The piping was subsequently depressurized again to attempt further repairs. These repairs were successful and verified using soap bubbles on December 10, 2019. The component remained on the delay of repair list pursuant to 60.5937a(h)(2) at the end of this annual reporting period but has now been successfully repaired.

The two reciprocating compressors at the station are subject to the work practice standards related to rod packing replacement found in 40 CFR 60.5385a. Specifically, the rod packing on each reciprocating compressor must be replaced every 26,000 operating hours per 60.5385a(a)(1). Per 60.5420a(b)(4)(i), the operating hours for each reciprocating compressor must be included in this report. At the end of this reporting period (October 31, 2019), Reciprocating Compressor #1 had operated 4,129 hours while Reciprocating Compressor #2 had operated 4,278 hours since both were placed into service. As such, rod packing replacement has not yet been required for either compressor.

Our intent was to file this annual report in US EPA's CEDRI system pursuant to 40 CFR 60.5420a(b)(11). However, according to information posted on the CEDRI site and conversations with US EPA personnel, the CEDRI template is not final at this time and the reporting portal for Subpart OOOOa is therefore not open. The portal likely will not reopen until the current rule reconsideration process has been completed. US EPA instructed us to file the report as we would other compliance reports until such time as the CEDRI template is finalized and the reporting portal is opened.

Gulf South is committed to maintaining its operations in compliance with all state and federal regulations. To the best of our knowledge, the only deviation from the requirements of 40 CFR 60, Subpart OOOOa during the reporting period was the one repair that was successfully completed more than 30 days after the leak was detected. Otherwise, the station has complied with all applicable provisions of Subpart OOOOa throughout the reporting period. Please contact me at david.nickel@bwpmlp.com or (903) 753-7209 (extension 2926) if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "David Nickel".

David Nickel
Environmental Specialist

Attachments

cc: US EPA, Region VI (Submitted electronically to R6WellCompletion@epa.gov)
Montz Compressor Station (Air Files)

Table 1
Summary of LDAR Monitoring Surveys

Company Name: Gulf South Pipeline Company, LP

Facility Name: Montz Station

Reporting Period: November 1, 2018 through October 31, 2019

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

(i)	(ii)	(ii)	(iii)	(iii)	(iv)	(iv)	(iv)	(v)	(vi)
Survey Date	Beginning Time	Ending Time	Name of Camera Operator	Training and Experience	Ambient Temperature (F)	Sky Conditions	Max Wind Speed (mph)	Monitoring Instrument Used	Any Deviations from Monitoring Plan? If so, describe
12/13/2018	9:00 AM	9:45 AM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	65	Mostly Cloudy	2	FLIR Model 320 Optical Gas Imaging Camera	No
2/15/2019	7:45 AM	9:00 AM	Bud McCorkle	Trained thermographer with 13 years of experience operating OGI camera	66	Mostly Cloudy	0	FLIR Model 320 Optical Gas Imaging Camera	No
4/24/2019	12:30 PM	1:30 PM	CR Thompson	Trained thermographer with 8 years of experience operating OGI camera	78	Mostly Cloudy	2	FLIR Model 320 Optical Gas Imaging Camera	No
9/26/2019	1:45 PM	2:45 PM	CR Thompson	Trained thermographer with 8 years of experience operating OGI camera	88	Sunny	0	FLIR Model 320 Optical Gas Imaging Camera	No

Table 2
Summary of Leak and Repair Data

Company Name: Gulf South Pipeline Company, LP

Facility Name: Montz Station

Reporting Period: November 1, 2018 through October 31, 2019

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

		(vii)	(x)	(viii)	(xi)	(xi)	(xii)
Leak #	Date Discovered	Component Type	Successful Repair Date	Repaired As Required in 60.5397a(h)?	Was Delay of Repair Necessary?	Explanation for Delay of Repair (if necessary)	Repair Verification Method
1	12/13/2018	Connector	12/10/2019	Yes	Yes	Blowdown of the fuel gas piping was necessary in order to complete repair.	Soap Bubbles
2	12/13/2018	Valve	1/21/2019	No	No	-	Soap Bubbles
3	2/15/2019	Valve	2/15/2019	Yes	No	-	OGI
No new leaks found on 4/24/19							
No new leaks found on 9/26/2019							

	(vii)	(vii)	(viii)	(xi)	(xi)
Survey Date	Component Type	Leaking Components Detected	Not Repaired As Required in 60.5397a(h)	Placed on Delay of Repair	Explanation for Delay of Repair (if necessary)
12/13/2018	Valve	1	1	0	-
12/13/2018	Connector	1	0	1	See above
2/15/2019	Valve	1	0	0	-

Note: Leak #1 was on delay of repair at the end of the reporting period; however, the leak has since been repaired.

40 CFR 60, Subpart OOOOa Annual Report Certification Statement

I, the undersigned, qualify as a certifying official pursuant to 40 CFR 60.5430a and hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document and its attachments are true, accurate and complete.



Dave Perkins

Vice President – Environmental, Safety, and Security

Date: January 20, 2020